

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**DECLARATION OF RON ZEMBER
IN SUPPORT OF DEFENDANT GOOGLE LLC'S
MOTION TO SEAL CONFIDENTIAL DOCUMENTS AND TESTIMONY**

I, Ron Zember, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am currently the Senior Finance Manager and Global Head of Finance for Google Network at Google LLC. I have been employed by Google Inc. and/or Google LLC since February 2015 in various roles. I submit this Declaration in support of Google's Motion to Seal Confidential Documents and Testimony.

2. Based on my work at Google, I have personal knowledge of the company's practices and procedures for maintaining the confidentiality of its strategic, business, and financial information, as well as the impact of publicly disclosing such information. The contents of this Declaration are true and correct to the best of my knowledge, information, and belief, and are based on Google's policies and practices as they relate to the treatment of confidential information, the materials that were provided to me and reviewed by me, and/or informed by conversations with other knowledgeable employees of Google. If called upon as a witness in this action, I could and would testify competently thereto.

3. Google follows a strict practice that requires confidential treatment of its product and customer data; internal strategic business plans; non-public financial information; and internal business analyses of customer spending, revenue, pricing, industry conditions, and opportunities. In my experience

and to the best of my knowledge, in order to protect itself from competitive harm, Google takes significant precautions to ensure that this information is not made public, and does not disclose documents or information of this nature outside of the company, with the exception of certain documents that Google shares with partners or fiduciaries, subject to further confidentiality requirements.

4. I have reviewed the trial exhibits identified below, and I believe that the sealing of those exhibits is necessary to protect Google's trade secrets and proprietary information.

5. I have reviewed RDTX635, RDTX671, and RDTX867. These documents consist of recent or current financial analysis, including profit and loss data for many Google products, and details concerning Google's internal systems and processes for financial reporting. Neither Google nor Alphabet discloses this information in public SEC filings at the granular level represented by these exhibits. Public disclosure of the information contained in these exhibits would provide Google's competitors with unfair access to Google's financial analyses, trajectory, and priorities, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2025, in New York, NY

Signed by:

Ron Zember

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Ron Zember, Senior Finance Manager and Global Head
of Finance for Google Network, Google LLC